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**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WASHINGTON**

In re:

GIGA WATT, Inc., a Washington
corporation,

Debtor.

Case No. 18-03197 FPC 11

The Honorable Frederick P. Corbit

Chapter 11

**CHAPTER 11 TRUSTEE'S MOTION
FOR ORDER APPROVING (I)
SALES OF VEHICLES, (II)
SHORTENED NOTICE, AND (III)
LIMITED NOTICE**

Mark D. Waldron, in his official capacity as the Chapter 11 Trustee (the
“**Trustee**”), hereby moves (the “**Motion**”) the Court pursuant to 11 U.S.C.
§§ 105, 363, Federal Rules of Bankruptcy Procedure 2002, 6004, 9006, 9014 and
LBRs 2002-1 and 6004-1 for an Order, a proposed form of which is attached
hereto as **Exhibit A**, approving the sales (the “**Sales**”) of a Ford box truck for
\$3,000 and a 2004 Chevrolet Avalanche for \$3,000. Both Sales are “as is” with no
warranty of any kind except of good title.

Chapter 11 Trustee's Motion for Order Approving (i) Sales of Vehicles, (ii)
Shortened Notice, and (iii) Limited Notice - Page 1

1 The Trustee further moves for an Order approving shortened and limited
2 notice of the proposed sales (the “**Notice**”) providing ten days’ notice (seven days
3 plus three for mailing), in substantially the form attached hereto as **Exhibit B**, to
4 be served upon:

- 5 a) The U.S. Trustee’s Office;
- 6 b) The Official Committee of Unsecured Creditors;
- 7 c) All parties receiving ECF notice, which includes the Chelan Douglas
8 Regional Port Authority, formerly the Port of Douglas County; and
- 9 d) The 20 largest creditors as designated on the Debtor’s schedules.

10 This Motion is supported by the *Memorandum of Points and Authorities in*
11 *Support of the Chapter 11 Trustee’s Motion for Order Approving (i) Sales of*
12 *Vehicles, (ii) Shortened Notice and (iii) Limited Notice* and the *Declaration of*
13 *Mark D. Waldron in Support of the Chapter 11 Trustee’s Motion for Order*
14 *Approving (i) Sales of Vehicles, (ii) Shortened Notice, and (iii) Limited Notice,*
15 filed herewith.

16 WHEREFORE, the Trustee respectfully requests entry of an Order:

- 17 1. Granting the Motion;
- 18 2. Approving the Sales;
- 19 3. Finding that the Sales are entered into in good faith and waiving the
20 14-day stay set forth in Fed.R.Bank.P. 6004(h); and
- 21 4. Approving the form and manner of service of the Notice, including
22 the request for shortened time to object and limited notice;

1 5. Granting such other and further relief as the Court deems necessary
2 and just.

3 Dated: April 24, 2020

POTOMAC LAW GROUP PLLC
By: /s/ Pamela M. Egan
Pamela M. Egan (WSBA No. 54736)
*Attorneys for Mark D. Waldron, Chapter
11 Trustee*